

Exhibit E

David Rothstein

From: David Rothstein <drothstein@rothsteinlawfirm.com>
Sent: Friday, March 27, 2015 12:00 AM
To: 'Kathryn Thomas'
Cc: 'Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)'
Subject: RE: Irani

Kathryn. I will address the items below and those from your Feb. 27 correspondence over the weekend, when I have available time to turn my attention to Dr. Irani's case. In the mean time, please supplement your interrogatory response to provide a meaningful response to the 13 of the 16 interrogatories to which you objected. Your previous position that I should be able to find the answers to your interrogatories myself by reviewing your document production is clearly not appropriate.

Also, please provide to me complete responses to the Interrogatories and Requests for Production directed at the individual Defendants Koon and Walsh so that I may have them in sufficient time to prepare for their depositions on April 21 and 22. You will recall that in my e-mail of 12/17/15, I stated, "As long as I can get complete responses to my discovery from USC and Palmetto Health, I am fine with holding off on the individual discovery of Koon and Walsh until after the qualified immunity issue is addressed by the Court." Because you have failed to satisfy the express condition of my prior accommodation--namely providing complete discovery responses to me from USC--I must now insist on receiving the discovery responses from the individual Defendants in this case. I am happy to discuss this further with you if you would like. Thank you, Dave.

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From: Kathryn Thomas [mailto:kthomas@gsblaw.net]
Sent: Thursday, March 26, 2015 7:59 PM
To: David Rothstein (drothstein@rothsteinlawfirm.com)
Cc: Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)
Subject: Irani

David –

I sent you an email earlier today requesting unredacted copies of your bates-numbered documents 553, 589, 611, 632, and 1149.

We have found some documents in your production that show patient names that should be redacted by all parties. They are your bates-numbered documents 636, 911, 913, 1011, and 1946. Please confirm you agree.

We believe Dr. Irani needs to amend and supplement his discovery responses and document production in several respects, in addition to those set forth in my February 27 correspondence below: